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U.S. Department of Transportation
Dockets Management Facility
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Re: Docket No. FHWA-2001-8954

Gentlemen,

As per the Advanced notice of proposed rulemaking & request for comments on possible revisions and modifications to the National Bridge Inspection Standards, I would like to submit the following document.

As a Professional Engineer & Commercial Diver conducting underwater bridge inspections and assessments for over 25 years I have a great concern, shared by a number of my colleagues, over the inspection of bridges by un-trained sport SCUBA divers. As a director of the Association of Diving Contractors International, I see many instances where diving bridge inspections are done by un-qualified divers. I have attempted to address the concern in my attached comments and hope that in your review of the regulations and possible modifications that this matter is addressed.

Yours truly,

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Minimum Qualifications for Bridge Inspectors

Proposed modifications to 23CFR650.307

(a) The individual in charge of the organizational unit that has been delegated the responsibility for bridge inspection, reporting, and inventory shall possess the following minimum qualifications:

- (1) Be a registered Professional Engineer in Civil, Structural, or Mechanical engineering, and
- (2) Have a minimum of 10 years experience in bridge inspection assignments in a responsible capacity

(b) The individual in charge of a bridge inspection team shall possess the following qualifications:

- (1) Be a registered Professional Engineer in Civil, Structural, or Mechanical engineering, and
- (2) Have a minimum of 5 years experience in bridge inspection assignments in a responsible capacity

The individual in charge of the bridge inspection team need not accompany every bridge inspection team in the field for routine biennial inspections, but must exercise direct supervision over bridge inspectors in the field, and shall review bridge inspection reports produced by field inspection teams.

(c) Individuals conducting routine biennial bridge inspections in the field shall possess the following minimum qualifications:

- (1) Be a registered Professional Engineer in Civil, Structural, or Mechanical engineering and have two years experience in design, construction, or inspection of bridges, or
- (2) Be a graduate engineer in Civil, Structural or Mechanical Engineering, possess an Engineer-in-Training certificate and have two years experience in inspection of bridges, or
- (3) Be a graduate engineer in Civil, Structural or Mechanical Engineering, possess an Engineer-in-Training certificate and have completed a comprehensive 80-hour minimum training course based on the *Bridge Inspector's Training Manual*, which has been developed by a joint State/Federal task force, or
- (4) Possess current certification as a NICET Bridge Safety Inspector, Level III or IV, under the National Society of Professional Engineers' program for National Certification in Engineering Technologies

Where routine biennial inspections are conducted by two-person teams in the field, only one person need possess the above qualifications. The intent is to allow second persons on bridge inspection teams to obtain experience leading to qualification.

- (d) For specialized underwater investigations, at least one member of the team conducting the inspection in the field shall possess the minimum qualifications as outlined under paragraph (b) above. When underwater inspections are conducted by divers, divers shall have been trained and have experience in commercial diving. Training shall be in accordance with ANSI Standard ANSI/ACDE-01-1998 Commercial Diver Training Minimum Standard, or have documented equivalent experience.